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July 22, 2020

VIA ECF

Hon. Alison J. Nathan
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 906
New York, NY 10007

**Re: *Williams v. L'Oreal USA, Inc.*,
Civil Action No.: 1:20-cv-03965-AJN (S.D.N.Y.)**

Dear Judge Nathan:

This firm represents Defendant L'Oreal USA, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Pamela Williams ("Plaintiff"), to respectfully request a thirty (30) day extension of time for Defendant to respond to the Complaint, up to and including August 26, 2020. This is the first request for an extension of this deadline. SO ORDERED.

By way of background, Plaintiff commenced this action on or about May 22, 2020. (ECF No. 1.) On May 27, 2020, Defendant executed a waiver of service pursuant to Fed. R. Civ. P. 4. (ECF No. 5.) Accordingly, Defendant's responsive pleading deadline is presently July 27, 2020.

Defendant respectfully requests that its responsive pleading deadline be extended by thirty (30) days to provide additional time to both continue investigating the allegations in the Complaint, and consider a non-litigated resolution of this action with Plaintiff.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines, including the Initial Pretrial Conference scheduled for October 16, 2020. We thank the Court for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Samuel Sverdlov

Samuel Sverdlov

SO ORDERED. 7/28/20

Alison J. Nathan, U.S.D.J.



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cc: All counsel of record (via ECF)